

REMARKS/ARGUMENTS

Reexamination of the captioned application is respectfully requested.

A. SUMMARY OF THIS AMENDMENT

By the current amendment, Applicants basically:

1. Editorially amend independent claim 1 to delete a reference numeral.
2. Amend independent claim 7 to emphasize that the serving control node and the drift control node belong to the radio access network (this is a non-narrowing amendment since it should be clear from the original terminology and use in the art that these control nodes are indeed nodes of a radio access network).
3. Respectfully traverse all prior art rejections.

B. PATENTABILITY OF THE CLAIMS

Claims 1-19 and 24-27 stand rejected under 35 USC 103(a) as being unpatentable over U.S. Publication 2001/0034228 to Lehtovirta et al in view of U.S. Patent 6,898,429 to Vialen et al. All prior art rejections are respectfully traversed for at least the following reasons.

All independent claims (1) refer to a message which is sent from a node of a radio access network to at least one other node of the radio access network with the message (2) including an element which collectively indicates that a subset of the connections are to be released. Applicants contend that the alleged combination of U.S. Publication 2001/0034228 to Lehtovirta et al and U.S. Patent 6,898,429 to Vialen et al. is improper, and even if assumed proper arguendo do not teach or suggest limitations including those above mentioned.

In particular, all independent claims require a message to a radio access network node with the message comprising an element which collectively indicates that a subset of the connections are to be released. Neither Lehtovirta nor Vialen teach or suggest such a collective indication.

Lehtovirta's concern is that upon failure only affected connections (e.g., affected radio access bearers) be released (see, e.g., Lehtovirta ¶[0020]). But in the Lehtovirta release messages are sent within the radio access network, e.g., release messages sent between radio access network nodes, each connection (radio access bearer) which is to be released is *listed separately*. See, e.g., Lehtovirta ¶¶[0044] - [0046], [0049]. In one embodiment Lehtovirta uses an IP address of a failed device, but the IP address is included in a message which is sent from a core network node to a radio access network node and thus not between nodes of a radio access network (see, e.g., Lehtovirta ¶[0047] *et seq*). As is commonly understood, a core network node is not a radio access network node. Thus, Lehtovirta fails to teach or suggest an intra-radio access network message comprising an element which *collectively indicates* that a subset of connections are to be released. Lehtovirta does not refer in an intra-radio access network context to a subset of connections nor does Lehtovirta have a collective indicator for such a subset.

Dependent claims 3, 13, and 16 refer, e.g., to plural processes performed by the same node which prepares the release message, and when the reset procedure affects a specific one of the plural processes, an element corresponding to the respective one of the plural subsets of connections handled by the specific one of the plural processes being included in the message. Thus, these claims require that the reset-affected process(es) reside at a node of a radio access network. Figs. 4 – 8 of U.S. Publication 2001/0034228 to Lehtovirta et al all show failure of processes at a core network node, not a radio access network node.

U.S. Patent 6,898,429 to Vialen et al., apparently applied for other reasons, does not cure the above-noted deficiency of U.S. Publication 2001/0034228 to Lehtovirta et al. Vialen is directed to paging of an individual user equipment unit, which is an entirely procedure than releasing a connection. Paging is typically handled uniquely or individually per user equipment unit, and thus is not ordinarily susceptible to group handling in the manner proposed by Applicants. Please note particularly in this regard that an objective of Vialen's CRNC is to assign a unique c-RNTI to a user equipment unit on an individual or per UE basis. For that among other reasons Vialen is not combineable with U.S. Publication 2001/0034228 to Lehtovirta et al for the purposes attempted in the office action.

Dependent claims 4, 6, and 10 all require, e.g., that the element comprise a group identity for the subset of connections; wherein the group identity comprises a group value and a group bit mask index, wherein the group bit mask index indicates bits of the group value which are common for all connections of the subset of connections; and wherein the group value is a group S-RNTI and the group bit mask index indicates the bits of the group S-RNTI which are common for all connections of the subset of connections. In rejecting these claims the office action basically refers to the Lehtovirta list of UE identifiers and to the s-RNTI of Vialen col. 2, lines 42 – 56. The Lehtovirta list is not only not a collective indication, but (since it is merely a list of individual radio access bearers) lacks the claimed group value and group bit mask index. Similarly, by definition the Vialen s-RNTI is associated with one and only user equipment unit, is sent in a message that concerns only one user equipment unit, and thus also lacks the claimed group value and group bit mask index.

D. MISCELLANEOUS

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. A formal indication of allowability is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: /H. Warren Burnam, Jr./

H. Warren Burnam, Jr.
Reg. No. 29,366

HWB:lsh
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100